GODDARD LAW

39 Broadway, Suite 1540 | New York, NY 10006

Office. 646.964-1178

Fax. 212.473.8705

Megan@goddardlawnyc.com

WWW.GODDARDLA Application granted.

SO ORDERED.

VIA ECF

The Honorable Judge Philip M. Halpern United States District Court Southern District of New York 300 Quarropas Street, Courtroom 520 White Plains, New York 10601

Philip M. Halpern

United States District Judge

Dated: White Plains, New York September 21, 2023

Re:

Juan Cisneros v. American Yacht Cub

Case No.: 7:23-cv-07520

Dear Honorable Judge Halpern:

The undersigned is counsel to Plaintiff Juan Cisneros ("Plaintiff") in the above-referenced matter. I write jointly with counsel for Defendant, to respectfully propose a schedule for the Parties' anticipated pleadings.

Plaintiff started this action by filing a Summons with Notice in the New York State Supreme Court, Westchester County on April 20, 2023. Counsel for Defendant removed this case to this Court on August 24, 2023. Plaintiff did not file a Complaint before the matter was removed to this Court. Also, the attorney who was handling this matter recently left the firm and the firm is working on reassigning the matter.

Accordingly, the Parties respectfully propose the following schedule for filing the anticipated pleadings:

Plaintiff's deadline to file a complaint October 20, 2023

Defendant's deadline to Answer or otherwise

respond to Plaintiff's complaint

cc: All counsel [Via ECF]

November 20, 2023

Initial Conference To be set by the Court

at your Honor's convenience

We thank the Court for its time and attention to this matter and its consideration of this request.

> Respectfully submitted, GODDARD LAW PLLC

15/ Megan S. Goddard

By: Megan S. Goddard, Esq.